

UNITED STATES DISTRICT COURT  
Northern District of California

JUN 21 2017

NORTHERN DISTRICT OF CALIFORNIA

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JUN 15 2017

SUSAN Y. SOONG  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

Manuel Alvarez Cabello Ramirez

plaintiff,  
Plaintiff

vs.

Google Inc.

[Name of  
defendant],  
DefendantCOMPLAINT FOR  
INFRINGEMENT

## JURISDICTION

1. This is an action seeking relief with respect to infringement of a United States Patent. Therefore, this court has jurisdiction of this action under 28 U.S.C. § 1338.

THE PATENT AND ITS OWNERS

E-Mail  
Juan@ram@gmail.com  
2. On August 2016 [date], the Plaintiff was issued United States Patent No. (510)850-2699. Since that date, Plaintiff has been and still is the owner of the Patent in question.

3. The Patent was issued in connection with Software Upgrades [describe invention].

4. Among other things, the Patent lists the following claims:

Google, Acquired Software Upgrades provided by myself, the Plaintiff  
Manuel Alvarez Cabello Ramirez, Device #(510)850-2699, E-mail  
Address: Juan@ram@gmail.com and never paid me for my  
090 Services.

Services are \_\_\_\_\_ [Describe relevant features of patent that are being infringed].  
being sold without my permission and/or I have not  
been compensated for my work.

INFRINGEMENT BY DEFENDANT

5. From at least August 2016 [date], Defendant has been and still is infringing the  
Patent in question by making, selling, and using a product entitled (510) 850-2499 [name of  
infringing product]. Juan 27 ram@gmail.com

6. The Defendant's product infringes on the patented invention by making, selling and using product  
[describe infringing characteristics]. without proper payment made to  
myself Manuel Alvarez Cabellero Ramirez  
for software upgrades.

CLAIM FOR RELIEF

7. Plaintiff has placed any and all required statutory notices on all products manufactured and  
sold by Plaintiff under the Patent.

8. On August 2016 [date], the Plaintiff demanded that Defendant cease and desist  
from its infringement of Plaintiff's patent by means of a written demand letter, a true and correct copy of  
which is attached to this complaint and incorporated by reference in it as Exhibit "\_\_\_\_\_."

9. Defendant has failed and refused to desist from infringing on Plaintiff's patent, and will  
continue to so infringe on Plaintiff's patent unless enjoined by this court.

10. Defendant's infringing conduct has damaged Plaintiff in a sum to be shown by proof at trial.

PRAYER

Plaintiff requests:

A. A temporary restraining order and a preliminary injunction prohibiting the Defendant from infringing on the patent during the pendency of this action;

B. A final and permanent injunction restraining the Defendant's and any of the Defendants agents, servants, employees, or other persons against continued infringement;

C. An accounting for damages caused by the infringement of the Defendant;

D. An assessment of interest and costs against defendant; and

E. Any and all other relief to which Plaintiff may be entitled.

Dated: 06/13/2017

Manuel Alvarez Cabello Ramirez

Juan 97ram@gmail.com